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March 23, 2021

Via ECF

Honorable Andrew L. Carter, Jr.
United States District Judge
Southern District of New York
United States Courthouse
40 Foley Square, Room 435
New York, NY 10007

Orrick, Herrington & Sutcliffe LLP

51 West 52nd Street
New York, NY 10019-6142

+1 212 506 5000

orrick.com

Ellen M. Murphy

E emurphy@orrick.com

D +1 212 506 3659

F +1 212 506 5151

Re: *United States v. Hernandez, et al.* – Larry Smith
Docket No. 18-CR-420 (ALC)

Dear Judge Carter:

We represent defendant Larry Smith in the above-captioned case and write to respectfully request a temporary modification of the conditions of Mr. Smith's release to permit him to travel outside the geographic areas set as a condition of his release. Specifically, Mr. Smith is requesting permission to travel to New Jersey on Sunday March 28, 2021 to take his family shopping. Mr. Smith will return to New York in time to be in his home in compliance with his 8:00 p.m. curfew set by Pretrial Services.

I have communicated with both the U.S. Attorney's Office and Pretrial Services about this application. Both AUSA Christopher Clore and Officer Mohammed Ahmed have informed me that they have no objection to this application. Currently, Mr. Smith's travel is limited to the Southern District of New York, and he is required to be in his apartment every night by 8:00 p.m. Accordingly, we respectfully request the Court modify Mr. Smith's conditions of release so that he may travel to New Jersey for one day on Sunday, March 28, 2021. Mr. Smith and his family intend to visit shopping malls and shopping centers in and around Paramus, New Jersey and North Bergen, New Jersey. Mr. Smith will be available at all times via the mobile phone that he has access to (his fiancé's cellular phone).

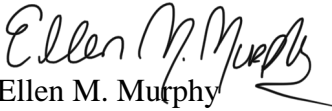
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Thank you for your consideration of this application. I am available at the Court's convenience if Your Honor has any questions.

Very truly yours,


Ellen M. Murphy

cc: AUSA Christopher Clore (*via ECF*)
Gregory Morvillo, Esq. (*via ECF*)
Officer Mohammed Amed (*via email*)

The application is **GRANTED**.
So Ordered.


3/23/21